

To whom it may concern:

This letter is intended to help guide the board's staff in drafting Ag Waiver 4.0, and how some of the proposed changes will impact central coast berry growers.

I'm the general manager of a family farm that has been growing berries on the central coast of California for four generations and over 70 years. We've been around for this amount of time by treating our ranches and employees with equal care, as without these two crucial elements, we'd never survive.

As a grower of cane berries (blackberries and raspberries, both organic and conventional), and of strawberries, we rely on plastic mulches and plastic tunnels to grow the best crop we can with as little pesticides, herbicides and fertilizer as possible. In strawberries, our plastic mulch reduces the demand of using excessive herbicides, or especially in the case of organic strawberries, reduces the hours of back breaking manual hand weeding. I fully agree that using these plastic mulches on steep slopes creates a major problem that needs to be addressed, we operate many low slope high quality ground ranches with plastic mulch, that only during the largest or most sustained of storms do we get sizeable runoffs, and we've also innovated the use of using drip tape to establish our crop as well, practically eliminating the need for sprinklers once the crop has been planted, and thus eliminating irrigation runoff.

As for cane berries, the high tunnels covered with plastic from approx. April thru November each season, this has reduced our dependency on fungicides, and greatly reduces the amount of nitrogen required per marketable flat of cane berries produced. While I fully agree that high tunnels left up during the winter on high slopes create a big problem, the vast majority of high tunnels are used in a judicious and reasonable fashion on low slopes and outside of the wettest months. One of the great things about cane berries is that we've created a system in which a grower would never have to touch a single pipe of sprinklers to bed up (on 99% of the seasons, I've been at this for 14 years and have yet to use a single sprinkler in our cane berry operation) plant and grow our cane berry crops. Plus cane berries are quite 'lean' on their water use, averaging below 1.5 acre feet on an annualized basis when looking at the entire three year cycle.

Our concern is that if the future Ag Waivers are too severe in their demands they might completely eliminate our ability to grow these essential crops in California. Many industries and many, many people rely on berries for the livelihoods in these communities. Our concern isn't with the cost to implement these proposed changes, it's more of a question if it's even possible to grow berries under these conditions.

Please consider looking at alternative proposals such as those set forth by the Grower Shipper Association and by the Farm Bureau. By partnering more with the growing community, I believe the board can reach its goals more quickly, while maintaining the critical balance of keeping the neighborhoods and communities that rely on agriculture thriving.

Thanks for your considerations,



Chris Matthews
General Manager
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